

**FILED****4/5/2024****THOMAS G. BRUTON**  
**CLERK, U.S. DISTRICT COURT****UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF ILLINOIS**  
**EASTERN DIVISION**

UNITED STATES OF AMERICA

v.

HUGO PINZON,  
also known as "Juiceman"

CASE NUMBER: 24 CR 176

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about April 4, 2024, at Chicago, in the Northern District of Illinois, Eastern Division, the defendant violated:

*Code Section*Title 21, United States Code, Section  
841(a)(1)*Offense Description*

did knowingly possess with intent to distribute 5 kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance

This criminal complaint is based upon these facts:

X Continued on the attached sheet.

/s/ John McDonnell (by JSS with permission)

JOHN MCDONNELL

Task Force Officer, Homeland Security  
Investigations (HSI)

Pursuant to Fed. R. Crim. P. 4.1, this Complaint is presented by reliable electronic means. The above-named agent provided a sworn statement attesting to the truth of the Complaint and Affidavit by telephone.

Date: April 5, 2024  
*Judge's signature*City and state: Chicago, IllinoisJEFFREY COLE, U.S. Magistrate Judge*Printed name and title*

UNITED STATES DISTRICT COURT            )  
  )  
NORTHERN DISTRICT OF ILLINOIS        )       ss

**AFFIDAVIT**

I, John McDonnell, being duly sworn, state as follows:

**BACKGROUND OF AFFIANT**

1. I am a Task Force Officer (“TFO”) with the Department of Homeland Security (“DHS”) Homeland Security Investigations (“HSI”) and have been so employed since approximately 2023. I am a sworn police officer in the state of Illinois with ten years of full-time experience. I am currently assigned to HSI Chicago’s Gang and Violent Crimes Task Force (“GVCTF”). Prior to becoming an HSI TFO, I served as a police officer with the Carpentersville Police Department since approximately 2019.

2. My duties with HSI involve investigating criminal violations of the federal narcotics and importation laws, including but not limited to Title 21, United States Code, Sections 841 and 846. I have been involved with various electronic surveillance methods, the debriefing of defendants, informants, and witnesses, as well as others who have knowledge of the distribution, transportation, storage, and importation of controlled substances. I have received training in narcotics investigations, money laundering, financial investigations, and various methods which drug dealers use to conceal and launder the proceeds of their illicit drug

trafficking enterprises. I have participated in numerous investigations involving violations of narcotics laws.

3. I have participated in investigations that have led to the issuance of search warrants involving violations of narcotic laws. These warrants involved the search of various locations, including but not limited to: residences of targets, their associates and relatives, “stash houses” (houses used as drug/money storage locations), storage facilities, bank safe deposit boxes, cellular/camera phones, and computers. Evidence searched for and recovered in these locations has included controlled substances, communications regarding distribution and receipt of controlled substances, records pertaining to the expenditures and profits realized there from, monetary instruments, and various assets that were purchased with the proceeds of the drug trafficking. I have participated in the execution of multiple federal search warrants.

#### **PURPOSE OF THE AFFIDAVIT**

4. This affidavit is submitted in support of a criminal complaint alleging that HUGO PINZON has violated Title 21, United States Code, Section 841(a)(1) (possession of a controlled substance with intention to distribute). Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint charging PINZON with possession with intent to distribute a mixture or substance containing a detectable amount of cocaine, I have not included each and every fact known to me concerning this investigation. I have

set forth only the facts that I believe are necessary to establish probable cause to believe that the defendant committed the offense alleged in the complaint.

5. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested complaint and does not set forth all of my knowledge about this matter.

### **FACTS ESTABLISHING PROBABLE CAUSE**

6. In or about January 2024, HSI received information from a confidential source ("CS1") that a person CS1 knows as "Hugo" was selling cocaine in the Chicagoland area.<sup>1</sup> CS1 relayed that Hugo's nickname in the "street" was "Juiceman" and his Facebook name was "Spanish Harlem."

7. Based upon CS1's information, law enforcement identified "Hugo" as potentially being "Hugo Patino PINZON." Law enforcement showed CS1 a photo of PINZON obtained from an Illinois Secretary of State driver's license database. CS1 positively identified the photo of PINZON as the person CS1 referenced as "Hugo."

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<sup>1</sup> CS1 was observed by law enforcement approximately four months ago engaging in potential narcotics violations. When approached by law enforcement, CS1 agreed to cooperate with law enforcement. CS1 does not have pending charges but cooperated with the hope that no charges would be filed. CS1 provided law enforcement credible information that has been corroborated through recordings, social media information, and surveillance, some of which is described in this affidavit. Since cooperating with law enforcement, on several occasions, CS1 provided information which led to the successful seizure of controlled substances, cash, and firearms. After these successful seizures, in or about January 2024, CS1 was informed that law enforcement would not propose charges to prosecuting authorities arising from the potential narcotics violations previously observed if CS1 provided information that led to one more similar seizure. CS1 has a criminal history that includes 9 convictions for assault, 1 for obstructing justice, 8 for traffic violations, 2 for invasion of privacy, 10 for narcotics, 1 for flight/escape, and 2 for breach of public peace/disorderly conduct. CS1 also has arrests that did not lead to convictions. On or about March 5, 2024, CS1 died from injuries sustained from a traffic accident.

PINZON's driver's license photo was also consistent with the public profile photo for the Facebook user with a profile with the username, "Spanish Harlem." The URL for the "Spanish Harlem" Facebook profile was <https://www.facebook.com/spanish.harlem>.<sup>14</sup>

8. In or about mid-January 2024, CS1 had a FaceTime video chat with PINZON. This video chat was unrecorded and was not observed by law enforcement. According to CS1, PINZON mentioned during this video chat that he had cocaine for sale and showed CS1 what was for sale. CS1 observed what appeared to be a white shaped, rectangular brick with the logo of the National Basketball Association ("NBA") (basketball player appearing to dribble a ball) stamped on the brick. According to CS1, based upon CS1's background and knowledge of drug sales, CS1 recognized this to be a kilogram of cocaine.

***January 16, 2024: PINZON Sold Cocaine to CS1***

9. In or about mid-January 2024, CS1, at the direction of law enforcement, purchased cocaine from PINZON in Chicago.

10. Specifically, according to CS1, PINZON stated over FaceTime that PINZON would sell CS1 "four and a split" for "25." This call was unrecorded and was not observed by law enforcement. Based on my training and experience, along with information relayed from CS1, I believe PINZON was willing to sell CS1 4.5 ounces of cocaine for \$2,500. During the call, CS1 agreed to the purchase.

11. According to law , on or about January 16, 2024, on the day of the transaction, CS1 met with law enforcement officers at a predetermined location. Officers searched CS1 and their vehicle for money and illegal substances and found

none. CS1 was given \$2,500 and outfitted with an audio and video recording device. CS1, while under constant surveillance of law enforcement, drove to the transaction location in Chicago, Illinois. Law enforcement set up surveillance at the location. Law enforcement officers conducting surveillance observed CS1 exit their vehicle and walk up to a dark-colored Nissan SUV bearing IL registration FP126948 (“Target Vehicle 1”).<sup>2</sup> Surveillance officers further observed PINZON seated in the driver’s seat.<sup>3</sup> CS1 was observed opening the front passenger door of Target Vehicle 1.

12. According to CS1 and CS1’s video recording of the transaction, PINZON handed CS1 a white substance in a clear plastic bag. PINZON, in exchange, took the \$2,500 in buy funds that the CS1 had been given. CS1 then shut the passenger side door. Surveillance observed Target Vehicle 1 leave the location.

13. According to law enforcement reports, CS1 departed the meeting location while law enforcement maintained surveillance. Upon arriving at a pre-determined location, CS1 turned over the white powdery substance that CS1 had purchased from PINZON. CS1 stated they purchased the substance from the subject they knew as “Hugo.” Officers searched CS1 and their vehicle for any additional contraband and found none. A field test of the white powdery substance indicated positive results for the presence of cocaine.

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<sup>2</sup> According to state vehicle registration records, Target Vehicle 1 was registered to EAN Holdings LLC, which I understand to be an entity affiliated with Enterprise Rent-A-Car. According to records obtained from Enterprise Rent-A-Car, Target Vehicle 1 was rented under the name Individual A from December 21, 2023 to January 18, 2024.

<sup>3</sup> Law enforcement officers conducting surveillance compared the person they observed in the driver’s seat of Target Vehicle 1 to a known photograph of PINZON from law enforcement databases, and determined they were the same person.

***January 25, 2024: PINZON Sold Cocaine to CS1***

14. In or around late-January 2024, CS1, at the direction of law enforcement, again purchased cocaine from PINZON in Chicago.

15. Specifically, according to CS1, in or about late-January 2024, CS1 placed a Facetime video call to PINZON. This call was audio/video recorded. According to the recording, PINZON's face could be seen on the screen of CS1's phone during the call. During the call, CS1 told PINZON that CS1 wanted to buy "a four and a splitty [4.5 ounces of cocaine] my boy."<sup>4</sup> PINZON replied with "bet [agreeing to the transaction]."

16. According to law enforcement reports, on or about January 25, 2024, the day of the transaction, CS1 met with law enforcement officers at a pre-determined location. Officers searched CS1 for money or any illegal substances and found none. CS1 was provided with \$2,500 in buy funds and outfitted with an audio and video recording device. CS1 was driven to the transaction location by an undercover agent in the undercover agent's vehicle.

17. According to law enforcement reports, law enforcement officers set up surveillance at the transaction location. Surveillance officers observed CS1 exit the

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<sup>4</sup> This affidavit includes quotations from recorded written messages and oral conversations. The language that is quoted from the recorded messages and conversations throughout is based upon a preliminary review of the recorded conversations, and not final transcripts. The times listed for the recorded conversations are approximate. The summaries do not include all statements or topics covered during the course of the recorded conversations. At various points, I have included in brackets my interpretation of words and phrases used in the recorded conversations. My interpretations are based upon information received from CS1, the contents and context of the recorded conversation, events that took place before and after the conversations, my knowledge of the investigation as a whole, my experience and training, and the experience and training of other law enforcement agents in this investigation.

undercover agent's vehicle and walk up to a gray Toyota RAV4 bearing Florida license plate KBZZ01 ("Target Vehicle 2").<sup>5</sup> Surveillance officers could not observe who was seated in the driver's seat of Target Vehicle 2 due to the tinting of the window. CS1 opened the front passenger door of Target Vehicle 2.

18. According to CS1, PINZON handed a white substance in a clear plastic bag to CS1. PINZON in exchange took the \$2,500 from CS1. CS1 then shut the passenger side door of Target Vehicle 2 and walked away.

19. According to surveillance officers, Target Vehicle 2 then departed the area and proceeded to park in the 1500 block of North Western Avenue in Chicago.

20. CS1 was driven away from the location by the undercover agent to a predetermined location. CS1 turned over the suspected cocaine purchased from PINZON. Officers searched CS1 again for any additional contraband and found none. A field narcotics test of the white powdery substance indicated positive results for the presence of cocaine.

21. According to law enforcement reports, on or about February 1, 2024, law enforcement officers conducting surveillance units on the 1500 block of North Western Avenue observed PINZON exiting a residential building at 1537 North Western Avenue (the "Subject Residence") and enter Target Vehicle 2.<sup>6</sup>

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<sup>5</sup> According to government records, Target Vehicle 2 is registered to EAN Holdings LLC. According to records from Enterprise, Rent-A-Car, Target Vehicle 2 was rented to Individual A for the period of January 16, 2024 to February 15, 2024.

<sup>6</sup> According to law enforcement reports, on or about February 6, 2024, surveillance units on the 1500 block of North Western Avenue observed PINZON exit the Subject Residence and enter Target Vehicle 2. On or about February 6, 2024, Enterprise Rent-



22. According to law enforcement reports, on or about February 6, 2024, surveillance units on the 1500 block of North Western Avenue observed PINZON exit the Subject Residence and enter Target Vehicle 2. On or about February 6, 2024, Enterprise Rent-A-Car contacted law enforcement and advised that Target Vehicle 2 had been returned to them in the morning hours of February 6, 2024.

***Target Vehicle 3***

23. Enterprise Rent-A-Car advised HSI that the person who returned Target Vehicle 2 was Individual A and that Individual A had rented another vehicle, namely, a white 2023 Hyundai Santa Fe (“Target Vehicle 3”).

24. According to law enforcement reports, on or about February 7, 2024, HSI observed Target Vehicle 3 parked in the 1500 block of North Western Avenue, Chicago. Surveillance officers further observed PINZON exit the Subject Residence and enter Target Vehicle 3. A short time later, Target Vehicle 3 returned to the 1500 block of North Western Avenue and parked along the street. Officers observed PINZON exit the driver’s seat of Target Vehicle 3 and enter the Subject Residence.

25. According to Enterprise Rent-A-Car, Target Vehicle 3 was rented by Individual A on February 6, 2024 with a scheduled return date of February 15, 2024.

26. On or about February 8, 2024, Magistrate Judge Maria Valdez of the Northern District of Illinois authorized the installation and monitoring of a GPS tracking device on Target Vehicle 3 (reference 24 M 85).

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A-Car contacted law enforcement and advised that Target Vehicle 2 had been returned to them in the morning hours of February 6, 2024.

27. On or about February 9, 2024, agents installed a GPS tracking device on Target Vehicle 3 on the 1500 block of N. Western Avenue

***February 14, 2024: PINZON Sold Cocaine to CS1***

28. In approximately mid-February 2024, CS1, at the direction of law enforcement, purchased cocaine from PINZON in Chicago.

29. According to CS1, in or about mid-February 2024, while driving, CS1 placed an unrecorded Facetime video call to PINZON in which CS-1 arranged to buy “quarter key,” meaning 0.25 kilograms of cocaine for \$4,250. PINZON agreed to meet CS1 on Bell Avenue north of West Le Moyne Street in Chicago.

30. According to law enforcement reports, on or about February 14, 2024, at approximately 11 A.M. CST, CS1 met with law enforcement at a pre-determined location. Officers searched CS1 for money and illegal substances and found none. Officers provided CS1 with \$4,250 in buy funds and outfitted CS1 with an audio and video recording device. CS1, while under constant surveillance of law enforcement, drove to the transaction location in Chicago.

31. According to law enforcement reports, at approximately 12:36 P.M. CST, surveillance units positioned outside of the Subject Residence observed PINZON exit the Subject Residence and enter Target Vehicle 3. Surveillance units observed Target Vehicle 3 travel down the rear alley behind the Subject Residence. The surveillance units lost sight of Target Vehicle 3 as they did not want to follow PINZON down the alley. However, GPS data showed Target Vehicle 3 stopped directly behind the Subject Residence.

32. According to GPS data, Target Vehicle 3 drove southbound down the alley from behind the Subject Residence towards the pre-determined meet location. Surveillance units were then able to maintain constant surveillance of Target Vehicle 3.

33. According to law enforcement officers conducting surveillance and CS1's audio/video recording, once Target Vehicle 3 arrived at the pre-determined meet location, CS1 entered Target Vehicle 3.

34. According to a video and audio recording of the transaction and CS1, PINZON handed something to CS1 and CS1 placed it in a backpack. PINZON, in exchange, took the buy funds that the CS1 had been given.

35. According to a video and audio recording of the transaction and CS1, CS1 and PINZON discussed what logo was stamped on the bricks of cocaine being distributed by PINZON. Based on my knowledge, training, and experience, bricks or kilograms of cocaine often are stamped with a logo, including by the supplier as a trademark stamp. CS1 asked if the cocaine still had the NBA logo, and PINZON replied that it was "Sonic," referencing the cartoon character Sonic the Hedgehog.

36. According to law enforcement reports, as CS1 exited Target Vehicle 3, surveillance officers observed that CS1 may have hit a vehicle in traffic with the car door. PINZON exited Target Vehicle 3 and surveillance units positively identified PINZON as the driver of Target Vehicle 3. Surveillance observed Target Vehicle 3 leave the location.

37. CS1 departed the meeting location while law enforcement maintained surveillance. Upon arriving at a pre-determined location, CS1 turned over the white powdery substance CS1 had purchased from PINZON. CS1 stated they purchased the substance from the subject they knew as “Hugo.” Officers searched CS1 and their vehicle for additional contraband and found none. A field test on the white powdery substance indicated positive results for the presence of cocaine.

***Target Vehicle 4***

38. On or about March 13, 2024, a manager at Enterprise Rent-A-Car advised that around 12:30 P.M. CT, a black 2022 Volkswagen Passat bearing IL registration FP 236116 and VIN 1VWSA7A32NC009972 (“Target Vehicle 4”) was rented by Black male who was accompanied by a Hispanic male. The manager was shown a picture of Individual A obtained from law enforcement databases and confirmed that Individual A was the Black male who rented Target Vehicle 4. The manager was shown a picture of PINZON and confirmed that PINZON was the Hispanic male.

39. According to law enforcement reports, on or about March 13, 2024, surveillance units saw PINZON exit the Subject Residence and enter the driver’s seat of Target Vehicle 4 and drive away.

***April 4, 2024: Law Enforcement Officers Recover Narcotics and Guns from the Subject Residence***

40. The Subject Residence is a three-story brick building, with a unit on each floor.

41. On March 20, 2024, PINZON's partner, Individual B,<sup>7</sup> was observed leaving the Subject Residence with a young male child. Individual B then proceeded with the young male child in Target Vehicle 4 to a school (the "Subject School"). Individual B was seen outside Target Vehicle 4 placing a jacket on the young male child and walked him into the Subject School. Individual B proceeded in Target Vehicle 4 back to the Subject Residence. Individual B was then observed entering Subject Residence.

42. According to law enforcement reports, on March 20, 2024, PINZON was observed leaving the Subject Residence observed with a plastic grocery type of bag before entering Target Vehicle 4. PINZON then drove Target Vehicle 4 to two different locations before returning to Subject Residence and parking outside Subject Residence. He was observed entering Subject Residence with empty hands.

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<sup>7</sup> Individual B was identified based on a comparison to a driver's license photo. I believe Individual B to be PINZON's partner based in part on the information described above and on publicly available social media posts, which show's PINZON's profile with photos of himself, Individual B, their shared child, posts regarding Individual B's business and shoes for sale. Also, surveillance has seen Individual B and PINZON leaving the Subject Residence together on multiple occasions and PINZON driving Individual B to work on several mornings.

43. According to a law enforcement database, PINZON's partner, Individual B, is associated with the first-floor unit of the Subject Residence.<sup>8</sup> According to law enforcement reports, on or about March 20, 2024, surveillance observed PINZON leave the Subject Residence in Target Vehicle 4. He made several stops that lasted less than a few minutes each. PINZON then proceeded back to the residence and was observed parking outside Subject Residence. PINZON was positively identified by surveillance units that were on foot. Those surveillance units were able to observe PINZON walking into the Subject Residence building. They were also able to surveil PINZON walking to unit #1, entering his keys into the door, and crossing the threshold of unit #1.

#### ***Search of the Subject Residence***

44. On or about March 22, 2024, Magistrate Judge Keri L. Holleb Hotaling signed a search warrant authorizing a search of the subject residence (24 M 218).

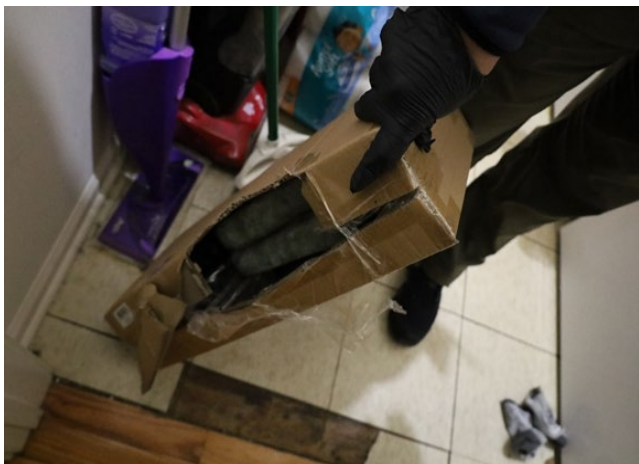
45. On or about April 4, 2024, at approximately 3:33 P.M. CST, law enforcement officers executed the search warrant.

46. In the utility closet located on the main floor of the Subject Residence, law enforcement officers located five bundles of a substance wrapped tight in plastic wrap that field tested positive for the presence of cocaine and weighed approximately 5.465 kilograms. Images of the bundles in the cardboard box in which they were

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<sup>8</sup> Individual B was identified based on a comparison to a driver's license photo. I believe Individual B to be PINZON's partner based in part on the information described above and on publicly available social media posts, which show's PINZON's profile with photos of himself and Individual B. Also, surveillance observed Individual B and PINZON leaving the Subject Residence together on multiple occasions and PINZON driving Individual B to work on several mornings.

discovered (Image 1) and the bundles themselves when they were subsequently weighed and tested (Image 2) are below.



*Image 1*



*Image 2*

47. In a lower cabinet within the kitchen of the Subject Residence, law enforcement officers located one bundle of a substance wrapped in plastic wrap that field tested positive for the presence of fentanyl and weighed approximately 550.76 grams (pictured in Image 3 below). Law enforcement located a money counter and vacuum sealer in the same cabinet.



*Image 3*

48. In a lower cabinet within the kitchen of the Subject Residence, law enforcement also located:

- a. Two loaded Glock handguns with magazines (Image 4 below), located in a lower cabinet.
- b. Six bundles in a vacuumed sealed bag containing suspected cannabis, located in a lower cabinet.



*Image 4*

49. In the primary bedroom of the Subject Residence, in which PINZON's driver's license was present, law enforcement located:

- a. Two loaded Glock handguns with extended magazines (Image 5 below);
- b. Assorted ammunition; and
- c. U.S. currency in a grocery bag.





*Image 5*

50. In the closet of the primary bedroom of the Subject Residence, law enforcement located the following additional firearms:

- a. One AR-15 style rifle (Image 6 below);
- b. Three loaded Glock handguns;
- c. One loaded Sig Sauer handgun;
- d. One loaded high-capacity drum magazine (Image 7 below).



*Image 6*



*Image 7*

51. In a basement closet of the Subject Residence, law enforcement located one automatic style rifle with a drum magazine and two handguns within a bucket on the floor (Image 8 below).



*Image 8*

52. The search of the Subject Residence revealed numerous mail and bills sent to the Subject Residence in the names of PINZON and Individual B. The search did not reveal any indicia of adults other than PINZON and Individual B residing at the Subject Residence.

53. Individual B was present at the Subject Residence throughout the search and advised law enforcement that none of the contraband or evidence located during the search was hers, and that she had no knowledge of contraband in the Subject Residence. Individual B stated that she resided at the Subject Residence with PINZON and their four-year-old son.

## CONCLUSION

54. Based on the information in this affidavit, there is probable cause to believe that PINZON possessed with intent to distribute a controlled substance, namely, 5 kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1).

FURTHER AFFIANT SAYETH NOT.

/s/ John McDonnell (by JSS with permission)

JOHN MCDONNELL

Task Force Officer, Homeland Security  
Investigations

SWORN TO AND AFFIRMED by telephone April 5, 2024.

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Honorable JEFFREY COLE  
United States Magistrate Judge